

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Carol Knaak, Wanda Firchau,
and Kay Oliver, et al.,

Court File No. 13-CV-00829 (JRT/AJB)

Plaintiffs,

v.

Armour-Eckrich Meats LLC,

Defendant.

JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Plaintiffs Carol Knaak, Wanda Firchau and Kay Oliver, individually and on behalf of others similarly situated, by and through their attorneys, and Defendant Armour-Eckrich Meats LLC, (hereinafter “the Parties”), hereby move for:

1. Certification of a Rule 23 Class for settlement purposes;
2. Plaintiffs’ Counsel to be appointed as Class Counsel;
3. Named Plaintiff Carol Knaak to be appointed as Class Representative;
4. Plaintiffs’ Counsel to be appointed as Settlement Administrator;
5. A Class Notice and Claim Form to be approved for distribution; and
6. The scheduling of a final approval hearing.

This Motion is based the attached memorandum of law, the Affidavit of David E. Schlesinger, the Parties’ Settlement Agreement, the Proposed Class Notice, the Preliminary Allocation, and the Nichols Kaster Firm Resume. This Motion will also be

based upon the arguments of counsel should the Court wish to hold a hearing on Motion.

Dated: 6/16/14

NICHOLS KASTER, PLLP

s/ David E. Schlesinger

James H. Kaster, MN Bar No. 53946
Paul J. Lukas, MN Bar No. 22084X
David E. Schlesinger, MN Bar No. 387009
4600 IDS Center, 80 South 8th Street
Minneapolis, MN, 55402
Telephone: (612) 256-3200
Fax: (612) 215-6870
kaster@nka.com
lukas@nka.com
schlesinger@nka.com

**SUNDE, OLSON, KIRCHER
AND ZENDER, PLC**

Steven R. Sunde, MN Bar No. 107268
108 Armstrong Blvd. South
P.O. Box 506
St. James, MN 56081
Telephone: (507) 375-3352
Fax (507) 375-4483
ssunde@cccinternet.net

ATTORNEYS FOR PLAINTIFFS

Dated: 6/16/14

JACKSON LEWIS P.C.

s/ L. Dale Owens

L. Dale Owens, GA Bar No. 557482
Eric R. Magnus, GA Bar No. 801405
1155 Peachtree Street NE, Suite 1000
Atlanta, GA 30309-3600
Telephone: (404) 525-8200
Fax: (404) 525-1173
owensd@jacksonlewis.com
magnuse@jacksonlewis.com

D. Christopher Lauderdale, SC Bar No. 64221
55 Beattie Place
One Liberty Square, Suite 800
Greenville, SC 29601
Telephone: (864) 232-7000
Fax: (864) 235-1381
lauderdale@jacksonlewis.com

David Duddleston, MN Bar No. 0139804
225 South Sixth Street
Suite 3850
Minneapolis, MN 55402
Telephone: (612) 341-8131
Fax: (612) 341-0609
duddleston@jacksonlewis.com

ATTORNEYS FOR DEFENDANT